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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
NOBLE REY BREWING CO., LLC	§	CASE NO 18-34214
	§	
	§	

RESPONSE TO APPLICATION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE
AND TO COMPEL PAYMENT

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Noble Rey Brewing Co., LLC. ("Debtor") in the above-styled and numbered cause, and files this its Response to Motion of 1319 Motor Circle L.P. to Allow Administrative Claim Pursuant to 11 U.S.C. §503(b) and to Compel Payment of Same Pursuant to 11 U.S.C. §365(d)(3) ("Motion"), and in support thereof would respectfully show unto the Court as follows:

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits the first sentence of paragraph 2 of the Motion but has insufficient knowledge to admit or deny the remainder of paragraph 2 of the Motion.
3. Debtor admits the allegations contained in paragraph 3 of the Motion.

4. Debtor denies the allegations contained in paragraph 4 of the Motion, except Debtor admits the last sentence in paragraph 4 of the Motion.
5. Debtor denies the allegations contained in paragraph 5 of the Motion.
6. Debtor denies the allegation contained in paragraph 6 of the Motion.
7. Debtor makes no response to paragraphs 7 and 8 of the Motion as they do not assert any allegations against the Debtor.
8. Debtor denies the allegations contained in paragraph 9 of the Motion.
9. Debtor denies the allegations contained in paragraph 10 of the Motion.
10. Debtor denies the allegations contained in paragraph 11 of the Motion.
11. Debtor denies the allegations contained in paragraph 12 of the Motion.
12. Debtor denies the allegations contained in paragraph 13 of the Motion.
13. Debtor denies the allegations contained in paragraph 14 of the Motion.
14. Debtor makes no response to paragraph 15 of the Motion as it asserts no allegations against the Debtor.
15. Debtor denies the allegations contained in paragraph 16 of the Motion .
16. Debtor makes no response to paragraph 17 of the Motion as it asserts no allegations against the Debtor.

WHEREFORE, PREMISES CONSIDERED, Debtor, Noble Rey Brewing Co., LLC. respectfully pray this Honorable Court enter an denying the Motion and for such other and further relief, at law or in equity, to which Debtor may show itself justly entitled.

Respectfully submitted,

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BY: /s/ Eric Liepins
ERIC A. LIEPINS, SBN 12338110

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to Thomas Berghman, 3800 Ross Tower, 500 N Akard Street, Dallas, Texas 75201 via United States mail on this the 18th day of April 2019.

/s/ Eric Liepins
Eric A. Liepins